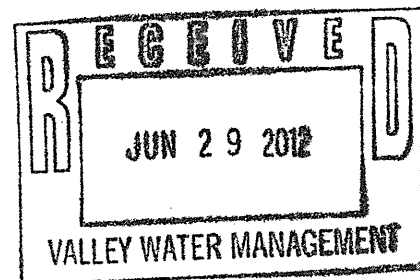


Central Valley Regional Water Quality Control Board

28 June 2012

NOTICE OF VIOLATION



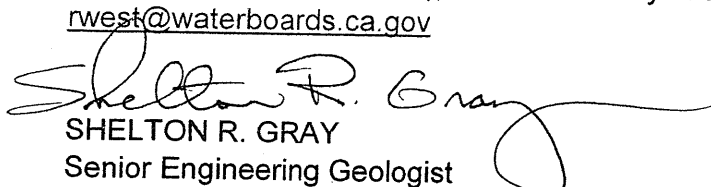
Larry Bright  
Valley Water Management Company  
7500 Meany Avenue  
Bakersfield, CA 93308

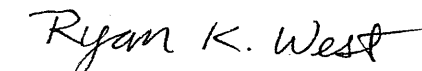
**INSPECTION REPORT – VALLEY WATER MANAGEMENT COMPANY, EDISON FEE 34 FACILITY, EDISON OIL FIELD, KERN COUNTY**

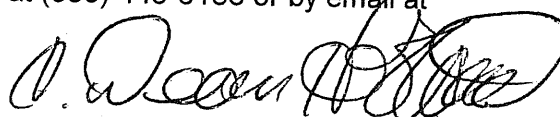
Enclosed is an inspection report for Valley Water Management Company's wastewater disposal operations at the Edison Fee 34 (a.k.a. Racetrack Hill, C-Plant) facility. Disposal operations at the facility are regulated by Waste Discharge Requirements Order 92-11037 (WDRs). At the time of the inspection, three surface impoundments (sumps) contained wastewater partially coated with crude oil, and the sumps are not netted, in **violation** of Discharge Specification B.4 of the WDRs.

The crude oil needs to be removed from the sumps immediately. By **13 July 2012**, please submit documentation that all oil has been removed from the surface of the wastewater. Interim measures need to be taken to preclude any further entry of crude oil. By **1 August 2012** please submit a plan and time schedule describing permanent measures to be implemented that will prevent crude oil from entering the facility, or that the sumps are going to be netted.

If you have any questions, please contact Ryan West at (559) 445-6188 or by email at [rwest@waterboards.ca.gov](mailto:rwest@waterboards.ca.gov)

  
SHELTON R. GRAY  
Senior Engineering Geologist

  
RYAN K. WEST  
Engineering Geologist

  
C. DEAN HUBBARD  
Engineering Geologist  
P.G. No. 6357

Enclosure: Inspection Report

cc: Mike Toland, CDOG&GR, Bakersfield  
California Department of Fish and Game, Fresno

OFFICE NO: 5F  
Inspector: RKW

## FACILITIES INSPECTION REPORT

Program Type: NON-15

5D159073001  
WDR ORDER NO

VALLEY WATER MANAGEMENT COMPANY  
PARTY NAME

EDISON, FEE 34  
PLACE NAME

92-11037  
WDR ORDER NO

7500 MEANY AVENUE  
STREET

SW ¼ of SECTION 34, T29S, R29E, MDB&M  
STREET

144517  
REG MEASURE ID

BAKERSFIELD, CA 93308  
CITY AND STATE

KERN COUNTY  
CITY AND STATE

06/20/2012  
ACTUAL INSP. DATE  
(MM/DD/YYYY)

LARRY BRIGHT  
CONTACT PERSON

RUSSELL EMERSON  
ONSITE CONTACT PERSON

(661) 410-7500  
PHONE NO.

(661) 978-0982  
PHONE NO.

Place ID: 222263

Party ID: 49654

If this inspection is a Compliance Inspection of an NPDES facility, send a copy of this report to SWRCB's Division of Water Quality, Program Support Unit.

### INSPECTION TYPE (Check One)

- ☐ "A" type compliance – Comprehensive inspection in which samples are taken. (EPA Type S)
- ☒ "B" type compliance – A routine nonsampling inspection. (EPA Type C)
- ☐ Noncompliance follow-up – Inspection made to verify correction of previously identified violation.
- ☐ Enforcement follow-up – Inspection made to verify that conditions of an enforcement action are being met.
- ☐ Complaint – Inspection made in response to a complaint.
- ☐ Pre-requirement – Inspection made to gather information relative to preparing, modifying, or rescinding requirements.
- ☐ Miscellaneous – Any inspection type not mentioned above.

If this is an EPA inspection not mentioned above, please note type.  
(e.g. – biomonitoring, performance audit, diagnostic, etc)

(Type)

YES Were VIOLATIONS noted during this inspection? (Yes/No/Pending Sample Results)

NO Was this a Quality Assurance-Based Inspection? (Yes/No)

NO Were bioassay samples taken? (Yes/No) (If yes, then Static or Flowthrough)

### INSPECTION SUMMARY (REQUIRED) (500 character limit)

On 20 June 2012, I (Ryan K. West) inspected the Edison Fee 34 (Racetrack Hill – C-Plant) facility. The facility is regulated by Waste Discharge Requirements Order No. 92-11037 (WDRs). The facility contains seven surface impoundments used for oil separation and storage of oil field production wastewater. At the time of the inspection, three sumps contained wastewater partially coated with crude oil. The sumps are not netted to preclude the entry of wildlife, in violation of Discharge Specification B.4 of the WDRs.

INSPECTOR'S DATA:

Staff ID: 139472

SIGNATURE:

*Ryan K. West*

DATE

6/28/12

For Internal Use: Reviewed by:

(1)

*SRG*

(2)

(3)

(RKW) 139472

CIWQS Coordinator

CIWQS Entry Date: 06/22/2012

Regional Board File Number:

CIWQS Inspection ID:

8703602

# FACILITIES INSPECTION REPORT

(Page 3)

## INSPECTION OBSERVATIONS

The Edison Fee 34 facility (Figure 1) contains seven surface impoundments that are used for oil separation and storage of oil field production wastewater. The facility accepts approximately 9,000 barrels per day of produced oil field wastewater from several member dischargers within the Edison Oil Field. Wastewater from the Edison Fee 34 (a.k.a. Racetrack Hill, C-Plant) facility is subsequently piped approximately 3.5 miles north to VVWC's Edison (a.k.a. Racetrack Hill – Sec24) facility for disposal.

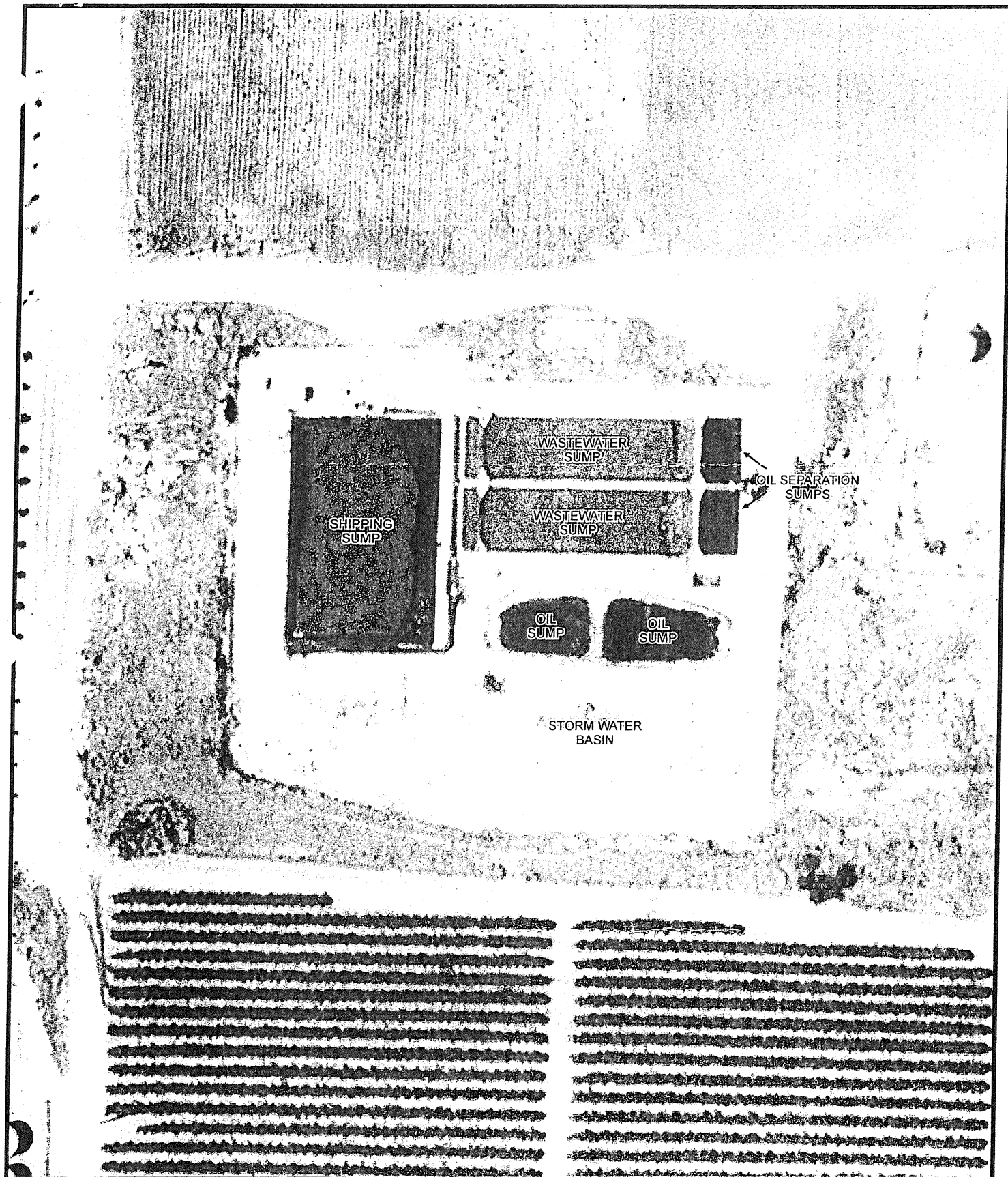
Incoming wastewater to the Edison Fee 34 facility enters two oil separation sumps that are netted and gunite lined (Photograph 1). From the oil separation sumps, the wastewater enters two unnetted, gunite lined sumps that are each approximately 125 feet in length and 45 feet wide. At the time of the inspection, the two sumps contained some floating crude oil on the surface of the wastewater (Photographs 2 & 3). Mr. Emerson informed me that the sumps are equipped with built-in skimmers, that when lowered by an operator, skim the oil off the wastewater and pipe the oil to two netted unlined oil sumps on the facility. Mr. Emerson stated that VVWC staff removes the crude oil on a daily basis.

The final sump in the series is referred to as the shipping sump. The shipping sump is unnetted and gunite lined with approximate dimensions of 150 feet in length and 50 feet in width. Wastewater from the shipping sump is pumped via pipeline to VVWC's Edison (a.k.a. Racetrack Hill – Sec24) facility for disposal. At the time of the inspection, the shipping sump contained wastewater with some crude oil floating on the surface of the wastewater in one corner of the sump (Photograph 4).

The facility also contains a storm water basin. At the time of the inspection the storm water basin did not contain any water.

## CONCLUSIONS

- At the time of the inspection, three sumps (two wastewater sumps and the shipping sump) contained wastewater partially coated with crude oil and the sumps are not netted. This is a violation of Discharge Specification B.4 of the WDRs. Oil needs to be removed and prevented from entering, or the sumps need to be netted.
- A 2011 aerial photo of the facility (shown on Figure 1) shows crude oil within the three unnetted sumps, which indicates the problem is a recurring violation.



Map Source:  
ESRI's ArcGIS Online Premium Services  
Section 34, T29S, R29E, MDB&M



### SITE MAP

ORDER NO. 92-11037

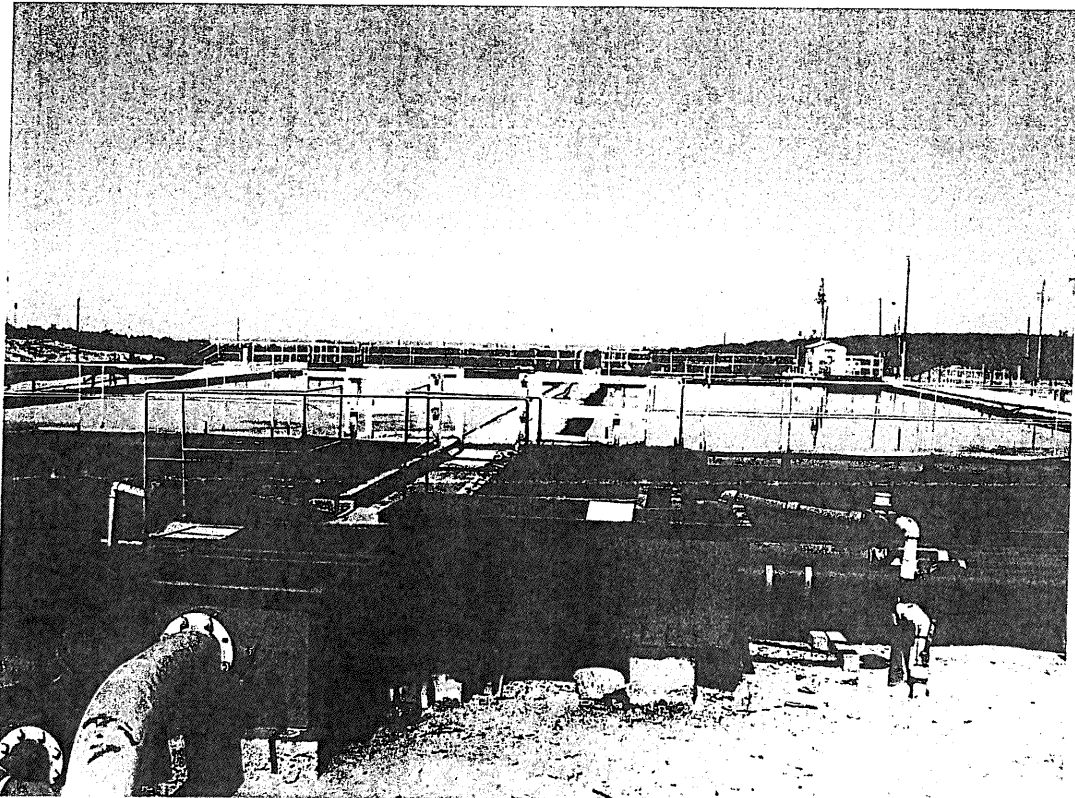
VALLEY WATER MANAGEMENT COMPANY

EDISON FEE 34 (RACETRACK HILL, C-PLANT) FACILITY

KERN COUNTY

FIGURE 1

VALLEY WATER MANAGEMENT COMPANY  
Edison Fee 34 (Racetrack Hill, C-Plant) Facility  
Section 34, T29S R29E, MDB&M  
Inspection date: 20 June 2012



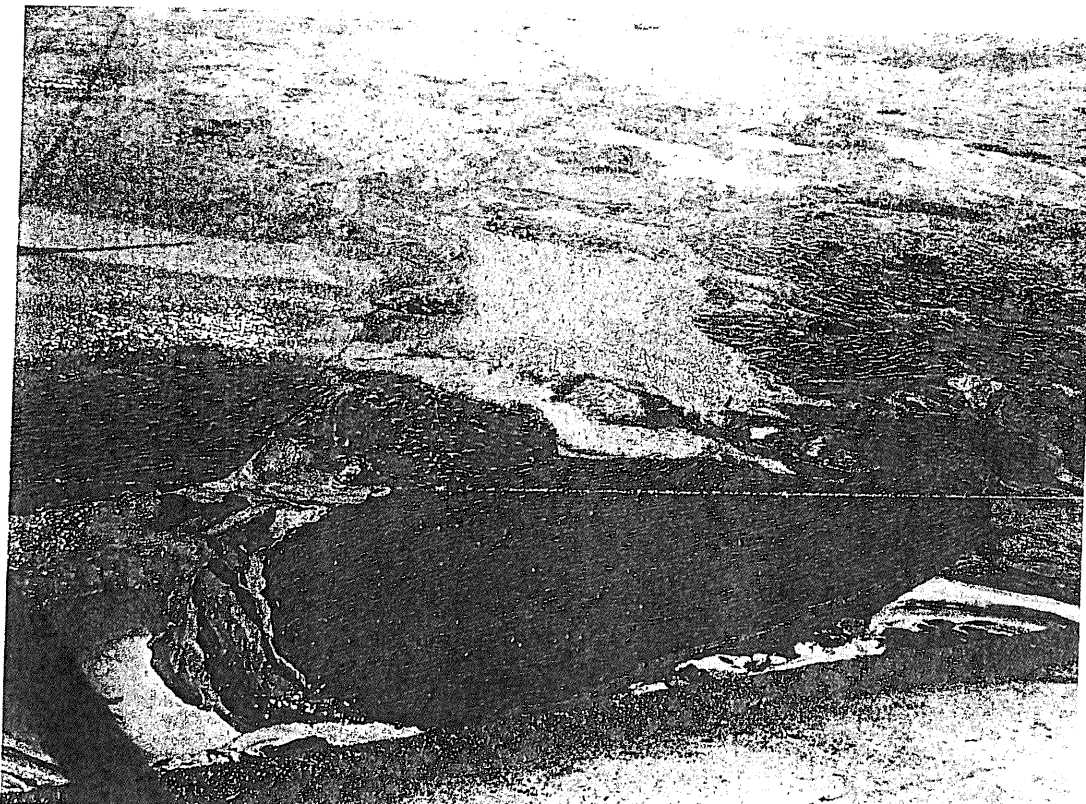
Photograph 1 - View of two oil separation sumps and two wastewater sumps.



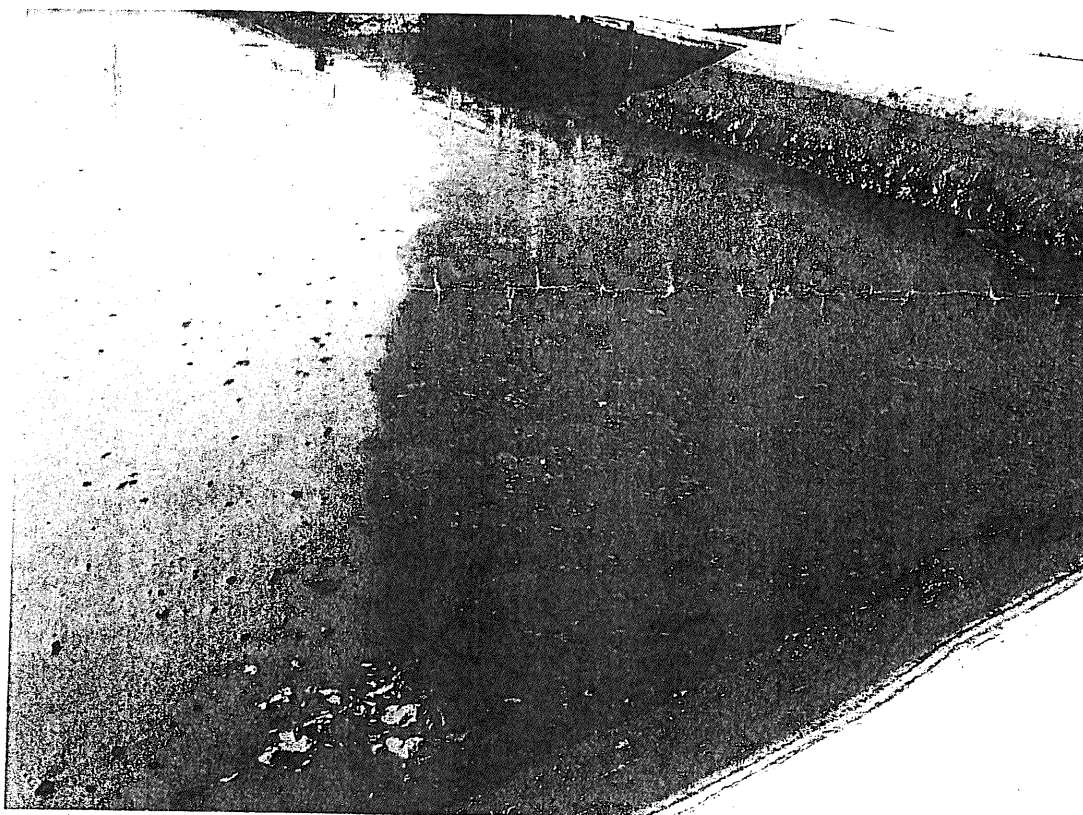
Photograph 2 - View of crude oil in one of the unnetted wastewater sumps.



VALLEY WATER MANAGEMENT COMPANY  
Edison Fee 34 (Racetrack Hill, C-Plant) Facility  
Section 34, T29S R29E, MDB&M  
Inspection date: 20 June 2012



Photograph 3 - View of crude oil in one of the unnetted wastewater sumps.



Photograph 4 - View of crude oil in one corner of the shipping sump.